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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,  
MICK CLEARY, EUGENE ALVIS, and  
JENNIFER NELSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**DECLARATION OF MARC A.  
WALLENSTEIN IN SUPPORT OF  
PLAINTIFFS' MOTION TO EXCLUDE  
EXPERT TESTIMONY**

Date: July 1, 2025

Time: 10:00 a.m.

Judge: Hon. Virginia K. DeMarchi

1 I, Marc A. Wallenstein, declare as follows:

2 1. I am an attorney at Korein Tillery LLC, counsel to Plaintiffs and putative class  
3 representatives Joseph Taylor, Mick Cleary, and Jennifer Nelson. I make this declaration in  
4 support of Plaintiffs' Motion to Exclude Expert Testimony. I have personal knowledge of the facts  
5 stated in the declaration and, if called as a witness, I could and would competently testify thereto.

6 2. Attached as Exhibit A is a true and correct copy of the Expert Rebuttal Report of  
7 Anindya Ghose, dated January 15, 2025.

8 3. Attached as Exhibit B is a true and correct copy of the Expert Report of Dr. Kevin  
9 Jeffay, dated January 15, 2025.

10  
11 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the  
12 United States of America that the foregoing is true and correct. Executed on March 11, 2025.

13  
14 Dated: March 11, 2025

/s/ Marc A. Wallenstein  
Marc A. Wallenstein

**PUBLIC VERSION**  
**REDACTED IN ITS ENTIRETY**

**Exhibit**  
**A**

to the Declaration of Marc A. Wallenstein in Support  
of Plaintiffs' Motion to Exclude Expert Testimony

**PUBLIC VERSION**  
**REDACTED IN ITS ENTIRETY**

**Exhibit**  
**B**

to the Declaration of Marc A. Wallenstein in Support  
of Plaintiffs' Motion to Exclude Expert Testimony